

REMARKS

Amendments

Amendments to the Claims

Applicant has amended the claims to clarify the language of the claims and to more particularly point out that Applicant's invention enables cross-network control of devices. No new matter has been added as a result of these amendments.

Rejections

Rejections under 35 U.S.C. § 102(e)

Claims 1-37

Claims 1-37 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Shteyn, U.S. Patent No. 6,618,764. Applicant does not admit that Shteyn is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant respectfully submits that Applicant's invention as claimed in claims 1, 3-11, 15, 19, 20, 25-29, 33 and 35-37 is not anticipated by Shteyn. Claims 2, 12-14, 16-18, 21-24, 30-32 and 34 have been cancelled.

Shteyn discloses a service that controls access between devices on dissimilar home networks. The service runs on a bridge device, such as a computer, that is connected to both networks and thus is compliant with the architecture of both networks.

The Examiner is equating Shteyn's service with Applicant's claimed proxy. However, Applicant claims the proxy is part of a device, compliant with one network, that can be controlled by a device that is compliant with a different network. Shteyn's service is part of a device that is compliant with both network architectures. Furthermore, Shteyn does not teach or suggest that the bridge device can be controlled any of the devices on either network. Therefore, Shteyn's service cannot be properly equated with Applicant's claimed proxy.

Accordingly, Applicant respectfully submits that the invention claims in claims 1, 3-11, 15, 19, 20, 25-29, 33 and 35-37 is not anticipated by Shteyn under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

New Claims

New dependent claims 38-43 have been added. Applicant respectfully submits claims 38-40 and claims 41-43 are allowable for at least the reasons set forth above for claims 11 and 29 from which they respectively depend.

SUMMARY

Claims 1, 3-11, 15, 19, 20, 25-29, 33 and 35-37 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

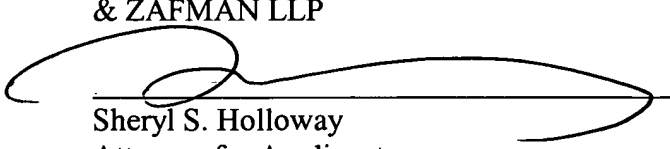
Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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